

From: [Courtney Vidales](#)
To: jill@leekaess.com; kevin.rethore@caffhill.com; rethorek@gtlaw.com
Cc: [Tom Mucci](#); [Ben Davis](#); [Justin Kaufman](#)
Subject: FW: Subpoena for Deposition to Lucia Hughes
Date: Wednesday, May 19, 2021 1:06:00 PM
Attachments: [202. Order on Hughes Service 5.10.21.pdf](#)
[Subpoena for Deposition- Lucia Hughes .5.11.2021-1.pdf](#)
[205. Notice of Video Deposition of Lucia Hughes 2021.05.19.pdf](#)

Mr. Rethore and Ms. Kaess,

I write to follow-up to the emails below regarding the deposition of Lucia Hughes currently noticed for June 3, 2021. We have not received a response to our prior emails confirming the deposition. Please confirm receipt of the attached Subpoena, Notice of Deposition, and Court Order and advise if Ms. Hughes intends to appear on June 3rd for her deposition.

Regards,

Courtney Johnson Vidales, Esq.
Mucci Law Firm
1600 Rio Grande Blvd. NW
Albuquerque, NM 87104
courtney@muccilaw.com
Office: (505) 247-2211

From: Courtney Vidales
Sent: Friday, May 14, 2021 8:38 AM
To: jill@leekaess.com
Cc: kevin.rethore@caffhill.com; rethorek@gtlaw.com; Tom Mucci <tom@muccilaw.com>; Ben Davis <bdavis@daviskelin.com>; Justin Kaufman <jkaufman@dpslawgroup.com>
Subject: FW: Subpoena for Deposition to Lucia Hughes

Ms. Kaess,

Attached is a Notice of Deposition for Lucia Hughes following the Federal Court Order entered on May 10, 2021. We have provided the Notice of Deposition, Subpoena, and Order to Ms. Hughes and Mr. Rethore in accordance with the directions stated on the Order.

I am providing a courtesy copy to you as well since you are counsel for Ms. Hughes in other matters, and because we have not received a response from Mr. Rethore with regards to the deposition and Court Order.

Regards,

EXHIBIT 3

Courtney Johnson Vidales, Esq.
Mucci Law Firm
1600 Rio Grande Blvd. NW
Albuquerque, NM 87104
courtney@muccilaw.com
Office: (505) 247-2211

From: Courtney Vidales
Sent: Friday, May 14, 2021 8:33 AM
To: kevin.rethore@caffhill.com; rethorek@gtlaw.com
Cc: Ben Davis <bdavis@daviskelin.com>; Tom Mucci <tom@muccilaw.com>; Justin Kaufman <jkaufman@dpslawgroup.com>; Lauren Martinez <lmartinez@daviskelin.com>; Brittany Chavez <brittany.chavez@muccilaw.com>; Harrington, Patrick M. <pharrington@dilworthlaw.com>; McMichael, Lawrence G. <lmcmichael@dilworthlaw.com>; Ford, Timothy J. <tford@dilworthlaw.com>
Subject: RE: Subpoena for Deposition to Lucia Hughes

Dear Mr. Rethore,

We have not received a response from you to the below email regarding Ms. Hughes' availability or location for deposition. Therefore, we are noticing Ms. Hughes deposition for June 3, 2021. Please find attached Notice of Deposition.

Regards,

Courtney Johnson Vidales, Esq.
Mucci Law Firm
1600 Rio Grande Blvd. NW
Albuquerque, NM 87104
courtney@muccilaw.com
Office: (505) 247-2211

From: Courtney Vidales
Sent: Tuesday, May 11, 2021 4:22 PM
To: kevin.rethore@caffhill.com
Cc: Ben Davis <bdavis@daviskelin.com>; Tom Mucci <tom@muccilaw.com>; Justin Kaufman <jkaufman@dpslawgroup.com>; Lauren Martinez <lmartinez@daviskelin.com>; Brittany Chavez <brittany.chavez@muccilaw.com>; Harrington, Patrick M. <pharrington@dilworthlaw.com>; McMichael, Lawrence G. <lmcmichael@dilworthlaw.com>; Ford, Timothy J. <tford@dilworthlaw.com>

Subject: Subpoena for Deposition to Lucia Hughes

Dear Mr. Rethore,

Attached please find the Order entered on May 10, 2021 in the matter of Anna K. Nupson v. Schnader, et al, instructing service of the attached Subpoena for Deposition of Lucia Hughes to your email and mailing address and to Ms. Hughes by certified and first class mail. The Order and Subpoena will be sent certified and first class mail tomorrow morning. The deposition is set for June 3, 2021 at 9:00 am MT and is currently set to take place via Zoom video. Please advise Ms. Hughes location so we may determine travel in the event we decide to take the deposition in person.

Regards,

Courtney Johnson Vidales
Mucci Law Firm
1600 Rio Grande Blvd. NW
Albuquerque, NM 87120
courtney@muccilaw.com
(505)247-2211